

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

In re:	§	
	§	
BELLA LOGISTICS LLC	§	CASE NO. 17-50913-CAG
	§	(Chapter 11)
Debtor	§	

**MOTION TO EXPEDITE APPLICATION OF DEBTOR TO APPROVE
EMPLOYMENT OF VILLA & WHITE LLP AS COUNSEL**

TO THE HONORABLE U. S. BANKRUPTCY JUDGE:

Now comes, Bella Logistics LLC, Debtor herein, and files this Motion to Expedite Application of Debtor to Approve Employment of Villa & White LLP as Counsel (the Application”) and would show the Court as follows:

On April 19, 2017, (the “Petition Date”), Debtor filed a Voluntary Petition under Chapter 11 of Title 11 of the Bankruptcy Code. Debtor’s most significant asset is a certain account receivable payable by Breitburn Energy Partners LTD (“Breitburn”). Breitburn is also in a chapter 11 bankruptcy currently pending in the United States Bankruptcy Court for the Southern District of New York. Debtor has filed a proof of claim in the Breitburn bankruptcy for \$3,328,031.02. Breitburn has filed an objection to Debtor’s claim. Debtor’s written response to Breitburn’s objection is due on June 1, 2017. Additionally the objection is set for a hearing on June 15, 2017.

The Application filed by Debtor requests that Villa & White LLP be approved as counsel for Debtor in this bankruptcy as well as representing the Debtor in the Breitburn bankruptcy. Since the response date to the Breitburn objection is due within the usual twenty-one day notice period, Debtor believes that an expedited hearing and ruling on the Application is necessary. As such, good cause exists for the granting of this motion.

WHEREFORE, PREMISES CONSIDERED, Bella Logistics LLC respectfully requests that its Application to Approve Employment of Villa & White LLP as Counsel be expedited on the Court’s docket, and for such other and further relief in law and in equity as may be just.

Respectfully Submitted,

Villa & White, L.L.P.
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By: /s/ Morris E. "Trey" White III
Morris E. "Trey" White, III
Texas Bar No. 24003162
Attorney for Debtor

CERTIFICATE OF CONFERENCE

I, Morris E. "Trey" White III do hereby certify that on May 8, 2017, I conferred with Kevin Epstein, staff attorney for the United States Trustee with regard to the relief requested in this Motion. Mr. Epstein does not oppose an expedited setting.

/s/ Morris E. "Trey" White III
Morris E. "Trey" White III

CERTIFICATE OF SERVICE

I, Morris E. "Trey" White III, do hereby certify that on the 15th day of May 2017, I mailed a copy of the foregoing instrument to parties listed on the attached creditor's matrix in compliance with Bankruptcy Local Rule 9013(g), by depositing the same in the United States First Class Mail, postage prepaid:

/s/ Morris E. "Trey" White III
Morris E. "Trey" White III